

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ADAM BALLE

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* C.A. No. 2:14-cv-0066

VS.

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CITY OF CORPUS CHRISTI, NUECES
COUNTY, TEXAS, CCPD Officer A.
SALINES or A. SALINAS #9163 and
CCPD Officer B. PERRIRAZ #8738
and CCPD Officer A. SALINAS #1362
TEN JOHN DOE DEFENDANTS AND
TEN JANE DOE DEFENDANTS

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* Plaintiff Requests a Jury Trial

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STIPULATION OF SETTLEMENT AND DISMISSAL OF CLAIMS BETWEEN
PLAINTIFF AND DEFENDANTS CITY OF CORPUS CHRISTI, CCPD OFFICERS
SALINAS AND PERRIRAZ

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff Adam Balle and Defendants City of Corpus Christi and City of Corpus Christi police officers Benjamin Perriraz and Albert Salinas, and file this the parties Stipulation of Settlement and Dismissal of Claims Between Plaintiff and Defendants City, Perriraz and Salinas, and would stipulate as follows:

1. Adam Balle, City of Corpus Christi, City of Corpus Christi police officers Benjamin Perriraz and Albert Salinas stipulate that they have settled and resolved the issues between them and request the Court enter a Final Judgment in the above numbered and styled cause of action.

2. The parties further stipulate that the settlement is solely between the parties to this stipulation and the settlement and dismissal will not prejudice the Plaintiff in pursuing any further rights and remedies Plaintiff may have to pursue in the District Court or pursuing an

appeal against any or all of the Defendants Nueces County, Texas, Sheriff Jim Kaelin, Deborah Charette and/or Chelsea Johnson, a nurse and physician's assistant.

3. The interlocutory order dismissing Nueces County and Sheriff Jim Kaelin on February 26, 2015. [D.E.#71] and the interlocutory order against Defendants Chelsea Johnson and Deborah Charette on September 30, 2015. [D.E.#109]. The court may enter a final judgment on the interlocutory orders making the interlocutory orders ripe for an appeal.

4. The proposed Dismissal and Final Judgment are being filed with this stipulation.

CERTIFICATE OF SERVICE: This document is being filed electronically and will be delivered via the Electronic Case Filing system to counsel who have appeared, counsel for **CITY CORPUS CHRISTI**, Mark DeKoch, Texas Bar 05722500, Federal ID 7442, MarkD@cctexas.com, and Jody D. Leake, Texas Bar 02407116, Federal ID 2119501, JodyL@cctexas.com, at 1201 Leopard Street, P. O. Box 9277, Corpus Christi, Texas 78469, (361) 826-3360, FAX: (361) 826-3360, FAX: (361) 826-3239; counsel for **POLICE OFFICERS**, James F. McKibben, Jr., SBOT 13713000, USDC#914, e-mail: jmckibben@mcv-law.com, Liza Aguilar Wood, SBOT 24006741, USDC# 23222, at McKibben & Villarreal, L.L.P., 1100 Tower II, 555 N. Carancahua, Corpus Christi, TX 78401-0841, (361) 882-6611, Facsimile: (361) 883-8353, counsel for **CHARETTE** and **JOHNSON**, David J. Dunn, SBOT 06243500, Fed. ID 438, at 611 South Upper Broadway, Corpus Christi, Texas 78401, (361) 883-1594, FAX: (361) 883-1599, e-mail:

dunndj@swbell.net, **NUECES COUNTY, KAELIN**, Jenny Cron, Assistant County Attorney, Texas Bar 00796237, Jenny.Cron@nuecesco.com, at 901 Leopard Street, Room 203, Corpus Christi, Texas 78401 (361) 888-0391, on this date April 28, 2016.

Respectfully submitted,

THE EDWARDS LAW FIRM

WILLIAM R. "Billy" EDWARDS, III
Attorney for Plaintiff
Texas Bar 06465010, Federal ID #
P. O. Box 480
Corpus Christi, TX 78403
Phone: 361-698-7600
Facsimile: 361-698-7614
e-mail: bedwards@edwardslaw.com

/s/ William H. Berry, Jr.
WILLIAM H. BERRY, JR.
Attorney in Charge for Plaintiff
Texas Bar 02251000, Federal ID 1155
GAIL D. C. DORN
Attorney for Plaintiff
Texas Bar 06007350, Federal ID 16311
P. O. Box 23064
Corpus Christi, Texas 78403-3064
(361) 888-5568
e-mail: berrylaw@sbcglobal.net

/s/ Mark DeKoch
Mark DeKoch
ASSISTANT CITY ATTORNEY
State Bar I.D. No. 05722500
Fed. I.D. No. 7442
ATTORNEY IN CHARGE FOR
DEFENDANT CITY OF CORPUS
CHRISTI
CITY OF CORPUS CHRISTI
LEGAL DEPARTMENT
P.O. Box 9277
Corpus Christi, Texas 78469-9277
Telephone: (361) 826-3360
Facsimile: (361) 826-3239
MarkD@cctexas.com

/s/ Lilia K. Castro
Lilia K. Castro
Assistant City Attorney
Federal I.D. No. 1419334
State Bar I.D. No. 24072122
ATTORNEY FOR DEFENDANT
CITY OF CORPUS CHRISTI
CITY OF CORPUS CHRISTI
Legal Department
P.O. Box 9277
Corpus Christi, TX 78469-9277
(361) 826-3360
(361) 826-3239 Fax
liliac@cctexas.com

/s/ James McKibben

James McKibben
Attorney-In-Charge
Southern District ID No. 914
State Bar No. 13713000
Liza Aguilar Wood
Of Counsel
State Bar No. 24006741
Federal Admission No. 23222
McKIBBEN & VILLARREAL, L.L.P.
1100 Tower II - 555 N. Carancahua
Corpus Christi, Texas 78401-0841
Telephone: 361.882.6611
Facsimile: 361.883.8353

ATTORNEY-IN-CHARGE FOR DEFENDANTS
ALBERTO SALINAS and BENJAMIN PERRIRAZ